

May 28, 2003

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, S.W. Washington, DC 20554 MAY 2 8 2003

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Re:

Submission to Official Record of:

MB Docket No. 02-277; MM Docket Nos. 01-235, 01-317, 00-244

Dear Ms. Dortch:

Please submit the attached document, entitled "Remarks at FCC Press Roundtable" to the official record for dockets MB 02-277. MM 01-235, 01-317, 00-244.

Sincerely,

Jennifer Phunrough

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Remarks at FCC Press Roundtable
May 27, 2003
The Rev. Robert Chase
Executive Director
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What people see, hear and read is inevitably a product -- at least in part -- of the racial, cultural and gender identities of those who produce news and information on the airwaves. The United Church of Christ has always been concerned about empowering those from historically marginalized communities to be represented fairly in the media.

The telecommunications industry accounts for one-sixth of our economy. Therefore, what is at stake here is the whole range of issues that accompany hiring and employment. The FCC's own data from 2001 show that only 4.3% of stations are women owned businesses and less than 3.5% are owned by people of color. This does not reflect the reality of our increasingly multi-cultural society. For us, it is a question of justice.

We must learn from what has been happening in radio since the passage of the Telecommunications Act of 1996. The wave of consolidation forces companies to choose between being buyers and sellers. Because minority and women owned companies are generally smaller, and have unusually difficult times raising capital, they have generally had so sell. With one major exception (RadioOne), that has been the experience in radio since 1996.

Recent experience may indicate that technology may not be the panacea for giving voice to the voiceless. Instead, it may be just the opposite: the vehicle through which the information divide intensifies and the big get bigger while the small disappear.

In 1968, the Kerner Commission charged the broadcast industry with special responsibility in our nation's movement toward two societies, separate and unequal, which is why the broadcast industry has been held to a higher standard for diversity recruitment and hiring. What we say about ourselves on the airwaves is critical to our wellbeing as a nation and our understanding of who we are.

A recent study by the Ford Foundation affirmed that local TV is the major source of news by Americans, by more than a 2:1 margin over its closest competitor. Claims that relaxing ownership caps will enhance diversity is counter-intuitive. The whole point of regulatory policy is to do what's best for the people -- all the people. We are not saying that marketplace values, which so dominate the debate today, are invalid. Rather, we claim they are insufficient for the public good. We call upon the FCC to exercise its congressionally mandated authority and set policies based not on economic efficiencies, but on the public interest.

It is a myth to assume that there is a national religious message. In virtually all faith groups, the foundational unit of mission and ministry is the congregation. Local culture and events shape religious expression. Since 1995, the number of entities owning commercial TV stations has dropped 40%, and consolidation in radio is even more dramatic. If ownership caps are relaxed, air time for diverse, locally-based religious and cultural voices will diminish, washed away in an homogenization of simplistic, lowest common-denominator platitudes. This is not good for faith groups and it is not good for democracy.

For more than 40 years, the Office of Communication of the United Church of Christ, Inc. has advocated on behalf of historically under-represented groups to help ensure access to decision-making positions in the media. The relaxation of ownership rules limits diversity and adds to the burden of media ownership and decision-making by women, people of color, linguistic minorities and others who seek a public voice in our society.